

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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July 9, 1998

VIA FEDERAL EXPRESS

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

Re: CC Docket No. 98-91

Dear Mr. Caton:

Enclosed you will find an original and twelve copies of two documents entitled, **MOTION OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA TO ACCEPT LATE-FILED REPLY COMMENTS ON THE PETITION OF SOUTHWEST BELL, PACIFIC BELL AND NEVADA BELL FOR RELIEF FROM REGULATION** and **REPLY COMMENTS OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA TO ACCEPT LATE-FILED REPLY COMMENTS ON THE PETITION OF SOUTHWEST BELL, PACIFIC BELL AND NEVADA BELL FOR RELIEF FROM REGULATION**.

Also enclosed is an additional copy of each document to be conformed and returned to me in the enclosed self-addressed envelope.

Thank you for your attention to this matter. If you have any questions, please call me at (415) 703-1952

Sincerely,

A handwritten signature in cursive script that reads "Mary Mack Adu".

Mary Mack Adu
Attorney for the People of the
State of California and the Public
Utilities Commission of the State
of California

MMA:cdl

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ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of:

Southwestern Bell Telephone Company,
Pacific Bell, and Nevada Bell Petition
for Relief from Regulation Pursuant to
Section 706 of the Telecommunications
Act of 1996 and 47 U.S.C. Section 160
for ADSL Infrastructure and Service.

CC Docket No. 98-91

**MOTION OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE
PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
TO ACCEPT LATE-FILED REPLY COMMENTS ON THE PETITION OF
SOUTHWEST BELL, PACIFIC BELL, AND NEVADA BELL FOR RELIEF
FROM REGULATION**

Pursuant to Sections 1.46 and 1.727 of the Federal Communications Commission's ("Commission" or "FCC") Rules, 47 CFR Sections 1.46, 1.727, the People of the State of California and the Public Utilities Commission of the State of California ("CPUC") hereby move the Commission to accept the CPUC's Reply Comments to SBC's Petition for Relief from Regulation of ADSL Infrastructure and Service Pursuant to Section 706 of the Telecommunications Act of 1996 and 47 U.S.C. Section 160. There are several grounds for this motion, the most compelling being the demands made on the CPUC Staff by Pacific Bell's Section 271 pre-application filing with the CPUC. Staff resources are necessarily allocated to the completion of this major effort. Exacerbating the staffing situation was the

very brief interval between the comment due date of June 24, 1998 and reply date of July 1, 1998, leaving insufficient time to receive, analyze, and draft a substantive response to the comments. As a key state that could be vitally impacted by the Commission's ruling in response to the SBC LEC Petition, the CPUC has a unique perspective and believes its Reply Comments will add value to the discourse and should be included for the Commission's consideration.

Therefore, for all of the aforementioned reasons, the CPUC respectfully requests that the Commission accept these Reply Comments.

July 9, 1998

Respectfully submitted,

PETER ARTH, JR.
WILLIAM N. FOLEY
MARY MACK ADU

By:


MARY MACK ADU

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San Francisco, CA 94102
Phone: (415) 703-1952
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Attorneys for the
Public Utilities Commission of the
State of California

CERTIFICATE OF SERVICE

I, Mary Mack Adu, hereby certify that on this 9th day of July, 1998, a true and correct copy of the foregoing document entitled, "MOTION OF THE PEOPLE OF THE STATE OF CALIFORNIA AND THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA ON THE PETITION OF SOUTHWEST BELL, PACIFIC BELL, AND NEVADA BELL FOR RELIEF FROM REGULATION" was mailed first class, postage prepaid to all known parties of record.

A handwritten signature in cursive script that reads "Mary Mack Adu". The signature is written in dark ink and is positioned above a horizontal line.

MARY MACK ADU